

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

LORA FREIER-HECKLER,)	Case No. 1:20-CV-00367
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
v.)	
)	
DENIS MCDONOUGH, ¹ SECRETARY,)	<u>DEFENDANTS' MOTION FOR</u>
DEPARTMENT OF VETERANS)	<u>SUMMARY JUDGMENT</u>
AFFAIRS, et al.,)	
)	
Defendants.)	

Pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, Defendants, Denis McDonough, Secretary of Veterans Affairs and the Louis Stokes Cleveland VA Medical Center, hereby move this Court for an order granting summary judgment in his favor in this case. Defendants are entitled to summary judgment because there are no genuine issues of material fact and Defendants are entitled to judgment as a matter of law.

The reasons for this Motion are set forth more fully in the attached Memorandum in Support, which is incorporated herein by reference.

¹ Secretary of Veterans Affairs Denis McDonough assumed office on February 9, 2021 and pursuant to Fed. R. Civ. P. 25(d), is automatically substituted as the defendant in this matter.

Respectfully submitted,

BRIDGET M. BRENNAN
United States Attorney

By: /s/ Rema A. Ina
Sara E. DeCaro (0072485)
Rema A. Ina (0082549)
Assistant United States Attorneys
United States Court House
801 West Superior Ave., Suite 400
Cleveland, OH 44113
(216) 622-3670 (DeCaro)
(216) 622-3723 (Ina)
(216) 522-4982 (Fax)
Sara.DeCaro@usdoj.gov
Rema.Ina@usdoj.gov

Counsel for Defendants